DIRECT COMMUNICATIONS LLC

February 25, 2010

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EB Docket 06-36
Annual Certification and Accompanying Statement for 2009
499 Filer ID: 819728

Dear Ms. Dortch:

Direct Communications, LLC submits the Annual Certification and Accompanying Statement for 2009 as required by 47 C.F.R. § 64.2009(e) and in accordance with the Public Notice DA 10-91, issued on January 15, 2010.

If you have any questions or need additional information, please contact me directly on 641-787-2396.

Sincerely,

Barbara E. Bouley
Manager-Regulatory

Cc: Best Copy and Printing, Inc
Via e-mail FCC@BCPIWEB.COM
445 12th Street
Suite CY-B402
Washington, DC 20554

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 25, 2010

Name of company covered by this certification: Direct Communications, LLC.

Form 499 Filer ID: 819728

Name of signatory: Robert C. Thompson

Title of signatory: Assistant Treasurer

I, Robert C. Thompson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company did not take any actions against data brokers in 2009.

The company did not receive any customer complaints in 2009 concerning the unauthorized release of CPNI.

Signed 

Robert C. Thompson

DIRECT COMMUNICATIONS LLC

Customer Proprietary Network Information (CPNI) Compliance Statement

The Federal Communications Commission refers to a customer's telephone account information as Customer Proprietary Network Information or CPNI. CPNI is defined as information that relates to the quantity, technical configuration, type, billing information, destination, and amount of use of a telecommunications service subscribed by any customer of a telecommunications carrier. CPNI does not include subscriber list information such as: name, address, and telephone number nor does CPNI include information about non-telecommunications services and products such as: Internet access, managed network services, cellular equipment, and other enhanced services.

Under federal law, you have the right to, and we have the duty to, protect the confidentiality of your telecommunications service information. The following are the procedures and policies Direct Communications has in place to ensure compliance with all FCC CPNI requirements.

CPNI Safeguards

All Direct Communications personnel receive training as to when they are and are not authorized to use CPNI safeguards. This training makes clear that personnel who fail to follow our privacy policies will face disciplinary action up to, and including, employment termination.

We strive to ensure that information we have about our customers are accurate, secure, and confidential and to ensure that our employees comply with CPNI rules. We never tamper with, intrude upon, or disclose the existence of any contents of any communication or transmission except as required by law or the proper management of our network.

Access to databases containing customer information is limited to personnel who need it to perform their jobs, and they follow strict guidelines when handling that information.

We use safeguards to increase data accuracy and to identify and authenticate the sources of customer information.

We use locks and physical security measures, sign on and password control procedures, and internal auditing techniques to protect against unauthorized use of terminals and entry into our data systems.

We require that records be safeguarded from loss, theft, unauthorized disclosure, and accidental destruction. In addition, sensitive, confidential, or proprietary records must be protected and maintained in a secured environment. It is our policy to destroy records containing sensitive, confidential, or proprietary information in a secure manner. Hardcopy, confidential, proprietary, or sensitive documents are made unreadable before

disposition or recycling, and electronic media are destroyed using methods that prevent access to information stored in that type of media.

Customer CPNI Information Rights

Direct Communications may use Customer Proprietary Network Information to offer the same category of services and/or products that a customer currently receives without requiring additional approval from a customer.

We also provide customers an opportunity to "opt-out" of sharing their CPNI information with our affiliated companies. We notify customers through written, oral, or electronic methods of their rights and obligations concerning their CPNI information. Customers, who do not wish to have their CPNI information shared with affiliated companies, may notify Direct Communications of this choice. If a customer does not notify us within thirty days (30) of receiving an "opt-out" notice, customer approval to use CPNI information is assumed. At any time a customer may notify Direct Communications that their choice regarding CPNI information has changed.

We have established procedures to provide written notice to the FCC of any instance where the "opt-out" mechanism did not work properly to such a degree that the customers' inability to "opt-out" is more than an anomaly.

Customer Record Flags and Access Audit

Customers, who do not want their CPNI information shared, will have their customer record flagged with a customer account warning. When an employee attempts to access this customer's record, the customer account warning will flash and notify the employee there are CPNI restrictions placed on the account.

In addition, although not required by CPNI rules, Direct Communications has an electronic audit mechanism that tracks access to a customer's account and shows the date, time, user name, and what customer information was accessed.

Sales and Marketing

Direct Communications maintains records of sales and marketing campaigns that use CPNI. These records include a description of the campaign, specific CPNI used in the campaign, the date and purpose of the campaign, and what products and services were offered during the campaign. This information is kept on file for one year after the completion of the sales and marketing campaign. All outbound marketing is subject to a supervisory review process to ensure compliance with all CPNI rules.

Customers, who require additional information regarding their CPNI rights, may contact Direct Communications by phone at 1-877-467-0849 or by writing to Direct Communications at P.O. Box 340, Annandale, Minnesota 55302-0340.